

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

FEE STATEMENT COVER SHEET

Debtor: LTL Management LLC Applicant: Paul Hastings LLP
Case No.: 23-12825 (MBK) Client: Ad Hoc Committee of Supporting Counsel
Chapter: 11 Case Filed: April 4, 2023

**SECTION I
FEE SUMMARY**

Monthly Fee Statement Covering the Period from
October 1, 2023 through October 31, 2023

Total Fees:	\$421,131.50
Total Disbursements:	\$3,306.17
Minus 20% holdback of Fees:	\$(84,226.30)
Amount Sought at this Time	\$340,211.37

				Total for Statement Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Hansen, Kris	Financial Restructuring	1996	\$2,135.00	1.50	\$3,202.50
Kinnaird, Stephen	Complex Litigation & Arbitration	1995	\$1,805.00	1.30	\$2,346.50
Murphy, Matt	Financial Restructuring	1999	\$1,805.00	1.70	\$3,068.50
Whitner, William	Complex Litigation & Arbitration	1996	\$1,700.00	12.50	\$21,250.00
Total Partner:				17.00	\$29,867.50

				Total for Statement Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Micheli, Matthew	Financial Restructuring	2002	\$1,700.00	16.40	\$27,880.00
Montefusco, Ryan	Financial Restructuring	2012	\$1,650.00	114.60	\$189,090.00
Traxler, Katherine	Financial Restructuring	1990	\$1,055.00	0.50	\$527.50
Total Counsel:				131.50	\$217,497.50
Farmer, Will	Financial Restructuring	2018	\$1,270.00	77.00	\$97,790.00
Glogowski, Angelika	Financial Restructuring	2021	\$940.00	18.30	\$17,202.00
Miliotes, Lanie	Financial Restructuring	2023	\$855.00	32.20	\$27,531.00
Simpson, Louise	Financial Restructuring	2022	\$855.00	28.90	\$24,709.50
Whalen, Michael	Complex Litigation & Arbitration	2015	\$1,360.00	2.70	\$3,672.00
Total Associate:				159.10	\$170,904.50
Laskowski, Mat	Financial Restructuring		\$540.00	1.30	\$702.00
Magzamen, Michael	Financial Restructuring		\$540.00	4.00	\$2,160.00
Total Paraprofessional:				5.30	\$2,862.00
Total:				312.90	\$421,131.50

**SECTION II
SUMMARY OF SERVICES**

	Total for Statement Period	
U.S. Trustee Task Code and Project Category	Total Hours	Total Fees
B110 Case Administration	3.40	\$6,200.50
B113 Pleadings Review	1.20	\$648.00
B155 Court Hearings	0.10	\$54.00
B160 Employment / Fee Applications (Paul Hastings)	7.10	\$8,283.00
B191 General Litigation	301.10	\$405,946.00
TOTAL	312.90	\$421,131.50

SECTION III
SUMMARY OF DISBURSEMENTS

Category	Total for Statement Period
Computer Search	\$3,241.27
Outside Professional Services	\$64.90
TOTAL	\$3,306.17

I certify under penalty of perjury that the above is true.

Date: March 6, 2024

/s/ Matthew M. Murphy
Matthew M. Murphy

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

PAUL HASTINGS LLP
200 Park Avenue
New York, New York 10166
Kristopher M. Hansen (*admitted pro hac vice*)

PAUL HASTINGS LLP
71 South Wacker Drive, Suite 4500
Chicago, Illinois 60606
Matthew M. Murphy (*admitted pro hac vice*)
Matthew Micheli (*admitted pro hac vice*)

COLE SCHOTZ P.C.
Court Plaza North
25 Main Street, P.O. Box 800
Hackensack, New Jersey 07602-0800
Michael D. Sirota
Warren A. Usatine
Seth Van Aalten (*admitted pro hac vice*)
Justin Alberto (*admitted pro hac vice*)

PARKINS & RUBIO LLP
700 Milam, Suite 1300
Houston, Texas 77002
Lenard M. Parkins (*admitted pro hac vice*)
Charles M. Rubio (*admitted pro hac vice*)

*Counsel to Ad Hoc Committee of Supporting
Counsel*

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,
COUNSEL TO AD HOC COMMITTEE OF SUPPORTING COUNSEL, FOR THE
PERIOD FROM OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

On June 20, 2023, the Court entered the Order Authorizing the Debtor to Enter into the Reimbursement Agreement [ECF No. 838] (the “Reimbursement Order”), pursuant to which the Debtor entered into a post-petition expense reimbursement agreement (the “Reimbursement Agreement”) to pay certain fees and expenses of the Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”).

The Reimbursement Agreement provides that the Debtor will pay the reasonable and documented fees and out-of-pocket expenses of professionals retained by the AHC of Supporting Counsel, including, among others, Paul Hastings LLP (“Paul Hastings”), for the period from April 18, 2023 through the termination of the Reimbursement Agreement.

The Reimbursement Agreement further provides that Paul Hastings will file monthly fee statements and interim and final fee applications in accordance with the Court’s Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals [ECF No. 562] (the “Interim Compensation Order”), entered on May 22, 2023.

The Court’s *Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures With Respect to Requests for Compensation; and (III) Granting Related Relief* [ECF No. 1211] (the “Dismissal Order”) provides that the “fees and expenses of professionals retained by the Ad Hoc Committee of Supporting Counsel shall remain subject to the” Reimbursement Agreement. The Dismissal Order further provides that the Interim Compensation Order “shall remain in full force and effect through and including the Appeal Exhaustion Date” for Retained Professionals, which covers professionals retained by the Ad Hoc Committee of Supporting Counsel.

Paul Hastings respectfully submits this Fee Application in accordance with the Reimbursement Order, the Reimbursement Agreement, the Interim Compensation Order and the Dismissal Order for services rendered and expenses incurred as counsel to the Ad Hoc Committee of Supporting Counsel for the period commencing October 1, 2023 and ending October 31, 2023 (the “Statement Period”).

The billing invoices, along with a detailed breakdown of all out-of-pocket disbursements necessarily incurred by Paul Hastings for the Statement Period are annexed hereto as Exhibit A. These invoices detail the services performed by Paul Hastings.

The payment of fees and reimbursement of expenses requested in this Statement are as follows:

Fees (100%)	Fee Holdback (20%)	Fee Payment (80%)	Expense Reimbursement (100%)
\$421,131.50	\$84,226.30	\$336,905.20	\$3,306.17

WHEREFORE, Paul Hastings respectfully requests payment of fees and reimbursement of expenses for the Statement Period of \$340,211.37 (80% of total fees and 100% of expenses) in accordance with the Interim Compensation Order.

Dated: March 6, 2024

PAUL HASTINGS LLP

/s/ Matthew M. Murphy

Matthew M. Murphy (*admitted pro hac vice*)

Matthew Micheli (*admitted pro hac vice*)

71 South Wacker Drive, Suite 4500

Chicago, IL 60606

Telephone: (312) 499-6000

Email: mattmurphy@paulhastings.com

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Kristopher M. Hansen (*admitted pro hac vice*)

200 Park Avenue

New York, NY 10166

Telephone: (212) 318-6000

Email: krishansen@paulhastings.com

Counsel to AHC of Supporting Counsel

EXHIBIT A



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Ad Hoc Committee of Supporting Talc Counsel in LTL February 9, 2024
488 Madison Avenue
New York, NY

Please Refer to
Invoice Number: 2387484

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Representation in Chapter 11 bankruptcy proceedings

PH LLP Client/Matter # 51691-00002
Scott A. Heard

Legal fees for professional services for the period ending October 31, 2023	\$421,131.50
Costs incurred and advanced	3,306.17
Current Fees and Costs Due	\$424,437.67
Total Balance Due - Due Upon Receipt	\$424,437.67



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Ad Hoc Committee of Supporting Talc Counsel in LTL February 9, 2024
488 Madison Avenue
New York, NY

Please Refer to
Invoice Number: 2387484

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Representation in Chapter 11 bankruptcy proceedings

PH LLP Client/Matter # 51691-00002
Scott A. Heard

Legal fees for professional services for the period ending October 31, 2023	\$421,131.50
Costs incurred and advanced	3,306.17
Current Fees and Costs Due	\$424,437.67
Total Balance Due - Due Upon Receipt	\$424,437.67



PAUL HASTINGS LLP
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Ad Hoc Committee of Supporting Talc Counsel in LTL February 9, 2024
488 Madison Avenue
New York, NY

Please Refer to
Invoice Number: 2387484

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
for the period ending October 31, 2023

Representation in Chapter 11 bankruptcy proceedings **\$421,131.50**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 Case Administration					
10/02/2023	MM53	Analyze case matters and next steps	0.20	1,700.00	340.00
10/06/2023	KH18	Discussion with AHC members regarding case and appeal updates	0.50	2,135.00	1,067.50
10/09/2023	KH18	Discussion with AHC members regarding case and appeal updates	0.50	2,135.00	1,067.50
10/10/2023	MM57	Correspond with M. Micheli re: LTL case monitoring	0.10	540.00	54.00
10/11/2023	MM57	Calendar critical dates in case	0.10	540.00	54.00
10/23/2023	MM53	Analyze case matters and action items	0.40	1,700.00	680.00
10/24/2023	MM53	Analyze case matters and strategy	0.20	1,700.00	340.00
10/25/2023	MM53	Analyze case matters and next steps	0.20	1,700.00	340.00
10/26/2023	KH18	Discussion with AHC members regarding case updates	0.50	2,135.00	1,067.50
10/26/2023	MM53	Analyze case matters	0.20	1,700.00	340.00
10/27/2023	MM53	Analyze case matters and next steps	0.10	1,700.00	170.00
10/30/2023	MM53	Analyze pending and upcoming case matters	0.20	1,700.00	340.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/31/2023	MM53	Analyze pending and upcoming case matters	0.20	1,700.00	340.00
Subtotal: B110 Case Administration			3.40		6,200.50

B113 Pleadings Review

10/10/2023	MM57	Review recent ECF filings and update working group re: same	0.20	540.00	108.00
10/11/2023	MM57	Review recent ECF filings and update working group re: same	0.10	540.00	54.00
10/25/2023	MM57	Correspond with R. Montefusco and W. Farmer re: case monitoring (.1); review cases being monitored (.1)	0.20	540.00	108.00
10/27/2023	MM57	Review recent ECF filings and update working group re: same (.3); review ECF notifications (.1)	0.40	540.00	216.00
10/31/2023	MM57	Review recent ECF filings and update working group re: same	0.30	540.00	162.00
Subtotal: B113 Pleadings Review			1.20		648.00

B155 Court Hearings

10/12/2023	MM57	Discussion with M. Micheli re prep for upcoming hearing	0.10	540.00	54.00
Subtotal: B155 Court Hearings			0.10		54.00

B160 Fee/Employment Applications

10/03/2023	LS27	Review and revise August monthly fee statement and related invoice	2.40	855.00	2,052.00
10/11/2023	LM20	Correspond with M. Micheli re final fee order (.1); correspond with Cole Schotz re same (.1)	0.20	855.00	171.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/11/2023	MM53	Review and revise final order approving Paul Hastings fee application	0.20	1,700.00	340.00
10/16/2023	MM53	Analyze final fee application and related hearing matters	0.30	1,700.00	510.00
10/18/2023	LS27	Correspond with C. Edge and M. Micheli regarding payment process for the unpaid amount approved as part of the final fee application	1.00	855.00	855.00
10/18/2023	MM53	Analyze final fee application matters	0.50	1,700.00	850.00
10/23/2023	LM20	Correspond with M. Micheli re final order approving fees	0.50	855.00	427.50
10/23/2023	MM53	Analyze final fee application and post confirmation compensation	0.50	1,700.00	850.00
10/25/2023	KAT2	Correspond with C. Edge regarding LTL services in August and September 2023 (.2); correspond with M. Murphy regarding fee matters (.1)	0.30	1,055.00	316.50
10/26/2023	KAT2	Review correspondence from M. Micheli regarding professional compensation matters (.1); correspond with C. Edge regarding same (.1)	0.20	1,055.00	211.00
10/26/2023	MM53	Review post-dismissal invoices	0.80	1,700.00	1,360.00
10/31/2023	MM53	Review final fee issues	0.20	1,700.00	340.00
Subtotal: B160 Fee/Employment Applications			7.10		8,283.00

B191 General Litigation

10/01/2023	LM20	Analyze direct certification case law for dismissal order appeal (1.8); draft factual background for appellate brief (1.7)	3.50	855.00	2,992.50
10/02/2023	LM20	Call with R. Montefusco and Counsel Press re appellate filing (.2); draft background section for appellate brief on dismissal order (3.4)	3.60	855.00	3,078.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/02/2023	LS27	Analyze application of standard for appellant standing in the Third Circuit (.8); draft analysis of findings (.5)	1.30	855.00	1,111.50
10/02/2023	MM57	Correspond with L. Miliotes re: Third Circuit brief	0.20	540.00	108.00
10/02/2023	RM30	Call with Counsel Press and L. Miliotes re petition for direct appeal (.2); correspond with AHC SteerCo re same (.2); analyze case law regarding application of section 157 (3.9); analyze case law re appellate standing (.8); correspond with L. Simpson re same (.2); call with W. Farmer re petition for direct appeal (.2); review and revise same (1.1)	6.60	1,650.00	10,890.00
10/02/2023	WCF	Call with R. Montefusco regarding petition for certification of direct appeal to Third Circuit (.2); draft background and procedural history with respect to petition for certification of direct appeal (2.6); analyze direct petitions to Third Circuit and authorities regarding section 158 standard (2.3); draft argument regarding direct appeal to Third Circuit (3.3)	8.40	1,270.00	10,668.00
10/03/2023	LM20	Review and revise petition for direct appeal to the Third Circuit (1.5); correspond with W. Farmer re same (.4)	1.90	855.00	1,624.50
10/03/2023	RM30	Review and revise petition for direct appeal to the Third Circuit (6.2); analyze case law contained therein (1.7); correspond with L. Miliotes re same (.2); review and revise disclosure statement and notice of appearance (.4); correspond with Cole Schotz re same (.2)	8.70	1,650.00	14,355.00
10/03/2023	WCF	Review, revise draft petition for direct appeal (1.1); correspond with R. Montefusco and L. Miliotes regarding same (.2)	1.30	1,270.00	1,651.00
10/04/2023	LM20	Draft background section of appellate brief (1.4); correspond with W. Farmer re same (.1)	1.50	855.00	1,282.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/04/2023	MMM5	Review joint petition for direct appeal (.4); correspond with K. Whitner and R. Montefusco regarding joint petition (.2)	0.60	1,805.00	1,083.00
10/04/2023	MM53	Analyze issues related to appeal of dismissal order	0.50	1,700.00	850.00
10/04/2023	MM53	Review and revise petition for direct appeal	1.70	1,700.00	2,890.00
10/04/2023	RM30	Analyze Debtor's draft joint petition for direct appeal (.6); correspond with K. Hansen and M. Murphy re same (.4); correspond with Jones Day re same (.1); call with K Whitner re appellate issues (.2); correspond with AHC SteerCo re petition for direct appeal (.3); analyze case findings re appellate standing (1.4); correspond with L. Simpson re same (.8); analyze transcript of argument on intervention (1.1); analyze authority re supplementing appellate designations (2.4); conference with Counsel Press re Third Circuit admissions (.3) B150: correspond with SteerCo, M. Micheli, M. Murphy, K. Hansen, A. Glogowski re PSA, strategy and next steps (.7)	8.30	1,650.00	13,695.00
10/04/2023	WCF	Review TCC and Debtor designations regarding direct appeal standing issues (.4); analyze authorities and case documents regarding supplemental designations (1.1); correspond with R. Montefusco regarding same (.2)	1.70	1,270.00	2,159.00
10/04/2023	WKW	Analyze Debtor's draft petition for direct appeal	1.10	1,700.00	1,870.00
10/04/2023	WKW	Analyze AHCSC draft petition for direct appeal (.8); call with R. Montefusco regarding same (.2)	1.00	1,700.00	1,700.00
10/05/2023	AG29	Correspond with M. Micheli regarding AHC subpoenas (.2); review documents related to same (.3); correspond with R. Montefusco, W. Farmer regarding same (.1)	0.60	940.00	564.00
10/05/2023	LM20	Draft background portion of appellate brief	2.60	855.00	2,223.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/05/2023	LS27	Analyze and summarize Third Circuit cases on persons aggrieved appellant standing (4.4); draft memo re same (1.6)	6.00	855.00	5,130.00
10/05/2023	MM53	Analyze standing issues and related authority in connection with appeal	1.20	1,700.00	2,040.00
10/05/2023	RM30	Analyze case law re appellate standing (3.2); correspond with K. Hansen, M. Murphy re same (.6); correspond with W. Farmer re supplementing record designations (.6); correspond with Counsel Press re joint petition for direct appeal (.8); analyze authority re corporate disclosure (1.8); correspond with AHC re same (.8); review and revise joint petition for direct appeal (2.2)	10.00	1,650.00	16,500.00
10/05/2023	WCF	Analyze authorities and local procedures regarding corporate disclosure obligations (.8); draft corporate disclosure statement (.2); correspond with R. Montefusco regarding same (.2)	1.20	1,270.00	1,524.00
10/06/2023	AG29	Correspond with R. Montefusco regarding LTL appeal and AHC contingency fee arrangements (.2); review and revise petition regarding language in appeal (.1); analyze AHC member retention agreements related to contingency fees (1.7); correspond with M. Magzamen, L. Morton (Cole Schotz) regarding unredacted versions of rule 2019 statements (.2); correspond with R. Montefusco regarding bankruptcy appeal research (.1); analyze case law and documents related to same (2.6); draft summary of findings (.8)	5.70	940.00	5,358.00
10/06/2023	LM20	Review and revise background portion of draft appellate brief	0.80	855.00	684.00
10/06/2023	LS27	Analyze case law regarding strictly financial prong of persons aggrieved standing test (2.0); draft summary of findings (.3)	2.30	855.00	1,966.50
10/06/2023	MMM5	Correspond with R. Montefusco regarding corporate disclosures	0.40	1,805.00	722.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/06/2023	MM57	Correspond with A. Glogowski re: unredacted rule 2019 statements (.1); research re: same (.3); correspond with Cole Schotz re: same (.1)	0.50	540.00	270.00
10/06/2023	RM30	Correspond with AHC re corporate disclosure (2.4); draft corporate disclosure statement (.6); review and revise joint petition for direct appeal (2.4); analyze case law re appellate standing (1.9); correspond with W. Farmer and M. Murphy re petition filing (.9)	8.10	1,650.00	13,365.00
10/06/2023	WCF	Review and revise joint petition for Third Circuit direct appeal before filing (.1); correspond with R. Montefusco regarding same (.1)	0.20	1,270.00	254.00
10/06/2023	WKW	Review final joint petition for direct appeal	0.50	1,700.00	850.00
10/07/2023	AG29	Analyze case law and documents related to bankruptcy appeal standards (1.7); draft summary of findings (.4); correspond with R. Montefusco regarding same (.1)	2.20	940.00	2,068.00
10/07/2023	RM30	Correspond with Jones Day re petition for direct appeal (.2); correspond with AHC re petition for direct appeal (.4)	0.60	1,650.00	990.00
10/09/2023	AG29	Correspond with R. Montefusco regarding appellate standing and prudential standing in bankruptcy	0.10	940.00	94.00
10/09/2023	LM20	Call with R. Montefusco re appellate standing (.3) review additional case law re same (.3)	0.60	855.00	513.00
10/09/2023	MM53	Analyze issues and authority related to appeal	0.30	1,700.00	510.00
10/09/2023	RM30	Analyze additional case law re appellate standing (6.3); call with L. Miliotes re same (.3); calls with W. Farmer re same (1.9)	8.50	1,650.00	14,025.00
10/09/2023	WCF	Draft Third Circuit appearance and disclosure documents (.6); analyze authorities regarding prudential standing and person aggrieved standard regarding appeal (2.5)	3.10	1,270.00	3,937.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/10/2023	AG29	Correspond with L. Simpson regarding appellate and prudential standing	0.20	940.00	188.00
10/10/2023	LM20	Analyze case law regarding aggrieved person standard and appellate standing (3.8); summarize findings re same (.8); correspond with W. Farmer re same (.2)	4.80	855.00	4,104.00
10/10/2023	LS27	Analyze case law regarding the direct prong of appellant standing in Circuit Courts of Appeal and district courts	5.50	855.00	4,702.50
10/10/2023	MM53	Analyze case law regarding aggrieved person standard and appellate standing	1.00	1,700.00	1,700.00
10/10/2023	MM53	Correspond with R. Montefusco regarding appeal issues	0.20	1,700.00	340.00
10/10/2023	RM30	Analyze case law re appellate standing (7.1); review and revise memo outline re same (.7); draft update to M. Murphy, M. Micheli, W. Farmer re same (.4); correspond with W. Farmer and L. Miliotes re same (1.2)	9.30	1,650.00	15,345.00
10/10/2023	WCF	Review appellate record regarding supplemental standing designations (.8); correspond with B. Churbuck (Cole Schotz) regarding same (.1); analyze authorities regarding zone of interests and prudential standing issues (3.8)	4.70	1,270.00	5,969.00
10/10/2023	WKW	Review plan for Third Circuit appeal	0.10	1,700.00	170.00
10/10/2023	WKW	Review Court order staying appeal briefing	0.10	1,700.00	170.00
10/11/2023	AG29	Analyze case law, documents, and issues related to memo on appellate standing and prudential standing in bankruptcy (3.9); draft memo riders related to analysis of same (1.6); correspond with R. Montefusco regarding same (.1)	5.60	940.00	5,264.00
10/11/2023	LM20	Analyze case law regarding aggrieved person standard and related policy issues (3.6); summarize findings re same (.7); analyze additional issues regarding bankruptcy appellate standing (2.4); call with W. Farmer re same (.1)	6.80	855.00	5,814.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/11/2023	LS27	Analyze case law regarding the direct prong of appellant standing in Circuit Courts of Appeal and district courts (4.4); draft memo re same (3.4)	7.80	855.00	6,669.00
10/11/2023	MM53	Analyze case findings regarding appellate issues	0.70	1,700.00	1,190.00
10/11/2023	RM30	Review and revise supplemental certification and supporting stipulation (.8); conference with S. Van Aalten re same (.4); analyze case law re appellate standing (6.2); review and revise memo outline re same (.8); conference with W. Farmer re same (.2); correspond with W. Farmer re same (.4)	8.80	1,650.00	14,520.00
10/11/2023	WCF	Analyze authorities regarding prudential standing and bankruptcy standing exceptions (2.7); conference with R. Montefusco regarding same (.2)	2.90	1,270.00	3,683.00
10/12/2023	AG29	Analyze case law, documents, and issues related to appellate standing and prudential standing in bankruptcy (2.2); draft memo riders related to analysis of same (1.6); correspond with R. Montefusco regarding same (.1)	3.90	940.00	3,666.00
10/12/2023	LM20	Analyze appellate standing and related litigation issues (1.8); summarize findings re same (.6); correspond with W. Farmer re same (.3)	2.70	855.00	2,308.50
10/12/2023	LS27	Further analyze case law regarding the direct prong of appellant standing in Circuit Courts of Appeal and district courts	1.20	855.00	1,026.00
10/12/2023	MM53	Analyze case findings re appeal and appellate standing	0.70	1,700.00	1,190.00
10/12/2023	MW22	Analyze draft common interest agreement	1.20	1,360.00	1,632.00
10/12/2023	MM57	Research fact background for brief (.2); correspond with L. Miliotes re: same (.1)	0.30	540.00	162.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/12/2023	RM30	Conference with K Whitner re appeal and supplemental certification (.8); revise standing memo (1.6); analyze case law re same (2.4)	4.80	1,650.00	7,920.00
10/12/2023	WCF	Analyze docket items regarding supplemental designations (.9); draft stipulation and proposed order regarding supplemental designations (1.9)	2.80	1,270.00	3,556.00
10/12/2023	WKW	Conference with R. Montefusco regarding legal support and argument for Committee standing to intervene	0.50	1,700.00	850.00
10/13/2023	LS27	Analyze precedent appellate briefs addressing appellate standing/persons aggrieved standard in the Third Circuit	0.60	855.00	513.00
10/13/2023	MM53	Analyze appeal status and related research issues	0.60	1,700.00	1,020.00
10/14/2023	WCF	Analyze authorities regarding exceptions to aggrieved person standing test (3.4); draft memorandum regarding same (1.4)	4.80	1,270.00	6,096.00
10/15/2023	WCF	Analyze bankruptcy standing authorities regarding flexibility in third party standing factors	3.10	1,270.00	3,937.00
10/16/2023	LS27	Review precedent appellate briefs in certain Third Circuit cases (.7); correspond with W. Farmer regarding same (.1)	0.80	855.00	684.00
10/16/2023	ML30	Correspond with L. Simpson re precedent appellate briefs in the Third Circuit (.1); research regarding same (1.1); follow up correspondence with L. Simpson regarding same (.1)	1.30	540.00	702.00
10/16/2023	MMM5	Review correspondence regarding appeal issues	0.70	1,805.00	1,263.50
10/16/2023	MM53	Analyze appeal status and open issues regarding same	1.10	1,700.00	1,870.00
10/16/2023	RM30	Analyze correspondence from J. Massey regarding appeal issues(.1); review M. Nachawatti transcript (.3); correspond with K Whitner re request to waive confidentiality (.2)	0.60	1,650.00	990.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/16/2023	WCF	Review deposition transcript (Majed) regarding TCC direct appeal response (.2); correspond with K Whitner, R. Montefusco regarding same (.2); review TCC and Arnold and Itkin direct appeal responses (.9); draft analysis regarding same (.5); correspond with K. Whitner, R. Montefusco, M. Micheli, K. Hansen, M. Murphy regarding same (.2); draft memorandum regarding aggrieved party standing (4.3); analyze additional authorities regarding same (5.1); further draft standing memorandum regarding same (2.0)	13.40	1,270.00	17,018.00
10/17/2023	RM30	Review and revise appellate standing memo (1.2); analyze authority cited therein (.8); correspond with W. Farmer re same (.4)	2.40	1,650.00	3,960.00
10/17/2023	WCF	Analyze third party standing authorities (3.4); draft standing memo regarding same (4.7); analyze authorities regarding additional defenses to aggrieved party standing challenges (2.1)	10.20	1,270.00	12,954.00
10/17/2023	WKW	Analyze case law supporting standing for appeal	3.50	1,700.00	5,950.00
10/18/2023	MW22	Analyze and revise draft common interest agreement	1.50	1,360.00	2,040.00
10/18/2023	MM57	Correspond with R. Montefusco re: Third Circuit filing (.1); research re: same (.2)	0.30	540.00	162.00
10/18/2023	RM30	Review and revise appellate standing memo	4.20	1,650.00	6,930.00
10/18/2023	SBK	Review R. Montefusco correspondence on appellate standing	0.20	1,805.00	361.00
10/18/2023	WCF	Analyze additional authorities regarding satisfying third party and/or aggrieved person standing (3.8); review and revise memorandum on standing regarding same (3.6); correspond with R. Montefusco regarding same (.2); further draft standing memo (1.6)	9.20	1,270.00	11,684.00
10/18/2023	WKW	Review Arnold & Itkin objections to joint petition for appeal	0.30	1,700.00	510.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/18/2023	WKW	Review TCC objections to joint petition for appeal	0.80	1,700.00	1,360.00
10/19/2023	LM20	Review and revise corporate disclosure statement and appellate notice of appearance (.6); correspond with W. Farmer re same (.2)	0.80	855.00	684.00
10/19/2023	MM53	Review supplement of record on appeal and related pleadings	0.50	1,700.00	850.00
10/19/2023	MM53	Analyze memorandum on standing for appeal	1.00	1,700.00	1,700.00
10/19/2023	RM30	Review and revise supplemental designations (.3); conference with Jones Day re same (.2); correspond with M. Micheli re same (.2); correspond with K Whitner re appellate standing issues (.4)	1.10	1,650.00	1,815.00
10/19/2023	SBK	Correspond with R. Montefusco on appellate standing	0.40	1,805.00	722.00
10/19/2023	WCF	Correspond with R. Montefusco and K Whitner regarding follow-up standing questions (.3); analyze authorities regarding same (.7); draft cover letter to court and related documents regarding stipulation to supplement appellate record (.4)	1.40	1,270.00	1,778.00
10/19/2023	WKW	Review memorandum and supporting case law analyzing standing for appeal	3.30	1,700.00	5,610.00
10/19/2023	WKW	Review supplemental designations of documents for appeal record	0.20	1,700.00	340.00
10/20/2023	LM20	Correspond with R. Montefusco re service of stipulation (.1); prepare draft email to S. Kinnaird re same (.4)	0.50	855.00	427.50
10/20/2023	MM53	Review appeal documents	0.60	1,700.00	1,020.00
10/20/2023	RM30	Finalize notice of appearance and corporate disclosure statement for filing (.5); conference with counsel re stipulation to supplement appellate record (.3); analyze Third Circuit decision on petition for direct appeal (.1)	0.90	1,650.00	1,485.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/20/2023	SBK	Review correspondence from R. Montefusco on standing	0.20	1,805.00	361.00
10/20/2023	SBK	Review appeal filings	0.20	1,805.00	361.00
10/23/2023	MM53	Review appeal issues	0.50	1,700.00	850.00
10/23/2023	MM57	Correspond with W. Farmer and R. Montefusco re: appellate fees (.1); review dockets re: same (.2)	0.30	540.00	162.00
10/23/2023	RM30	Conference with TCC re request to supplement appellate record (.3); conference with W. Farmer re appellate brief (.4); analyze caselaw re appellate standing (1.4)	2.10	1,650.00	3,465.00
10/23/2023	WCF	Call with R. Montefusco regarding appellate brief issues/tasks (.4); analyze authorities and prior LTL appeal briefing regarding brief scheduling, fees, and substantive briefing structure (1.2); analyze AHC substantive briefing before bankruptcy court regarding appeal outline (1.6)	3.10	1,270.00	3,937.00
10/24/2023	MM53	Review appeal issues	0.20	1,700.00	340.00
10/24/2023	RM30	Conference with Cole Schotz and K Whitner re motion to supplement the record (.7); prepare parts of same (.8); analyze case law re appellate standing (1.6)	3.10	1,650.00	5,115.00
10/24/2023	WCF	Correspond with R. Montefusco regarding supplemental designation motion (.3); draft outline and opening appellate brief argument section (3.3)	3.60	1,270.00	4,572.00
10/25/2023	RM30	Review and revise outline for appellate brief (.8); correspond with W. Farmer re same (.2); review and revise statement of facts in appellate brief (1.1)	2.10	1,650.00	3,465.00
10/26/2023	MM53	Review motion to supplement record and related appeal issues	0.40	1,700.00	680.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/26/2023	RM30	Review and revise motion to supplement record on appeal (.8); correspond with K Whitner re same (.2); conference with M. Winograd and M. Rasmussen re same (.2); conference with M. Rasmussen re appellate issues (.1); analyze authority re appellate standing (1.8); review and revise statement of facts in appellate brief (.7)	3.80	1,650.00	6,270.00
10/26/2023	WKW	Review motion to supplement record on appeal	0.30	1,700.00	510.00
10/27/2023	LM20	Review debtors' trial exhibits for appellate brief (.8); correspond with Cole Schotz re same (.1); correspond with W. Farmer re same (.1)	1.00	855.00	855.00
10/27/2023	MM53	Review appeal process matters	0.30	1,700.00	510.00
10/27/2023	MM53	Review and revise motion to shorten notice for motion to supplement record on appeal	0.40	1,700.00	680.00
10/27/2023	MM57	Correspond with C. Smith (Jones Day) re: requested trial exhibits (.1); correspond with L. Miliotes re: same (.1)	0.20	540.00	108.00
10/27/2023	RM30	Review and revise appellate brief (2.5); analyze documents and cases referenced therein (1.8); review and revise motion to shorten time on motion to supplement record (.8); review and finalize papers for filing (1.7); conference with Cole Schotz re same (.3)	7.10	1,650.00	11,715.00
10/27/2023	SBK	Review TCC motion to confirm standing (.2); correspond regarding same with R. Montefusco (.1)	0.30	1,805.00	541.50
10/27/2023	WCF	Review and revise motion to shorten time on motion to supplement record and supporting documents (.4); analyze authorities regarding Third Circuit appellate opening brief argument and form (.7)	1.10	1,270.00	1,397.00
10/27/2023	WKW	Analyze standing appeal strategy and consolidation schedule in advance of meeting with Debtors	0.80	1,700.00	1,360.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/30/2023	LM20	Correspond with B. Churbuck (Cole Schotz) re trial exhibits	0.10	855.00	85.50
10/30/2023	MM57	Follow-up correspondence with Jones Day re: trial exhibit repository (.2); correspond with M. Micheli re: MDL case pleadings (.1); research re: same (.3)	0.60	540.00	324.00
10/30/2023	RM30	Review and revise appellate brief (5.6); analyze cases and documents referenced therein (1.8); correspond with W. Farmer re filing fees (.3)	7.70	1,650.00	12,705.00
10/30/2023	WCF	Correspond with R. Montefusco regarding opening brief and notice letter (.2); revise notice letter (.1); correspond with B. Churbuck (Cole Schotz) regarding same (.1)	0.40	1,270.00	508.00
10/31/2023	LM20	Review and revise factual background of appellate brief	0.30	855.00	256.50
10/31/2023	MM53	Analyze appeal matters	0.30	1,700.00	510.00
10/31/2023	MM57	Follow-up correspondence with T. Villari (Jones Day) re: trial exhibits	0.10	540.00	54.00
10/31/2023	RM30	Review and revise notification of payment of filing fees (.9); correspond with W. Farmer and B. Wierenga re same (.3); review and revise statement of facts in support of AHC appeal (4.6)	5.80	1,650.00	9,570.00
10/31/2023	WCF	Correspond with B. Churbuck (CS) regarding filing of fee notice (.2); correspond with R. Montefusco regarding appellate brief revisions (.2)	0.40	1,270.00	508.00
Subtotal: B191 General Litigation			301.10		405,946.00
Total			312.90		421,131.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
KH18	Kris Hansen	Partner	1.50	2,135.00	3,202.50
SBK	Stephen B. Kinnaird	Partner	1.30	1,805.00	2,346.50

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MMM5	Matt M. Murphy	Partner	1.70	1,805.00	3,068.50
WKW	William K. Whitner	Partner	12.50	1,700.00	21,250.00
MM53	Matthew Micheli	Of Counsel	16.40	1,700.00	27,880.00
RM30	Ryan Montefusco	Of Counsel	114.60	1,650.00	189,090.00
KAT2	Katherine A. Traxler	Of Counsel	0.50	1,055.00	527.50
MW22	Michael C. Whalen	Associate	2.70	1,360.00	3,672.00
WCF	Will C. Farmer	Associate	77.00	1,270.00	97,790.00
AG29	Angelika S. Glogowski	Associate	18.30	940.00	17,202.00
LM20	Lanie Miliotes	Associate	32.20	855.00	27,531.00
LS27	Louise Simpson	Associate	28.90	855.00	24,709.50
ML30	Mat Laskowski	Paralegal	1.30	540.00	702.00
MM57	Michael Magzamen	Paralegal	4.00	540.00	2,160.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
09/30/2023	UnitedLex Invoices - Unitedlex Corp, Invoice# 090314 Dated 09/30/23, UnitedLex – DSAI September 2023 Charges – Outside Professional Services			64.90
10/02/2023	Lexis/On Line Search			35.25
10/02/2023	Westlaw			135.50
10/04/2023	Lexis/On Line Search			146.94
10/04/2023	Lexis/On Line Search			36.74
10/04/2023	Lexis/On Line Search			70.50
10/05/2023	Westlaw			56.57
10/05/2023	Westlaw			65.78
10/06/2023	Lexis/On Line Search			73.47
10/06/2023	Westlaw			28.28
10/06/2023	Westlaw			293.59
10/09/2023	Westlaw			28.28
10/09/2023	Westlaw			82.88
10/10/2023	Lexis/On Line Search			19.67

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10/10/2023	Westlaw	431.51
10/11/2023	Westlaw	225.62
10/11/2023	Westlaw	576.00
10/12/2023	Westlaw	28.29
10/12/2023	Westlaw	299.95
10/14/2023	Westlaw	37.49
10/16/2023	Lexis/On Line Search	110.21
10/16/2023	Westlaw	114.24
10/16/2023	Westlaw	131.56
10/17/2023	Lexis/On Line Search	73.47
10/18/2023	Westlaw	36.84
10/18/2023	Westlaw	73.67
10/19/2023	Westlaw	28.28
10/31/2023	Lexis/On Line Search - Courtlink Use - Charges for October 2023	0.69
Total Costs incurred and advanced		<hr/> \$3,306.17

Current Fees and Costs	\$424,437.67
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Total Balance Due - Due Upon Receipt	\$424,437.67
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